

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

NIKI ROBINSON AND PATRICK TOMLINSON,

Plaintiffs,

v.

Case No: 2:24-cv-264

CITY OF MILWAUKEE, ET AL.,

Defendants.

JOINT MOTION FOR STIPULATED PROTECTIVE ORDER

The parties, by their undersigned counsel, jointly request this Court to enter the accompanying Protective Order.

The parties believe there is good cause for entry of a protective order in this case. The circumstances surrounding this case stem from a group of anonymous actors who harass and stalk the Plaintiffs, including calling in the false police reports that gave rise to the police interactions at the heart of this case.

During the pendency of this case, counsels are aware that this group has been monitoring the docket to search for additional information they can use to contact individuals involved in the case. The group has also used the docket to collect information and generate fake social media profiles where they pose as individuals involved in the case.

Some of the documents exchanged in discovery contain personal information about the parties, including the personnel files of the Defendant officers. And some of the

documents exchanged in discovery show the internal structure of the Milwaukee Police Department and how the department responds to swatting calls, which could be dangerous if obtained by someone who wants to swat someone in Milwaukee.

Counsels believe that entry of the protective order will allow for the parties to exchange discovery and provide the Court with relevant documents while protecting the privacy and safety of the parties.

Dated: January 28, 2025,

STRANG BRADLEY, LLC

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